CALIFORNIA ENVIRONMENTAL QUALITY ACT NEGATIVE DECLARATION

Department of Toxic Substances Control Cleanup Program - Berkeley 700 Heinz Avenue Berkeley, California 94710-2721

Subject: ☐ DRAFT ☐ FINAL ☐ MITIGATED		
<u>Project Title</u> :		
Remedial Action Plans for Naval Station Treas (Former South Storage Yard)	sure Island Installation Restoration Sites 30	(Daycare Center) and 31
State Clearinghouse No.:		
Project Location: Former Naval Station Treasure	Island	
County: San Francisco		
<u>Project Description</u> : The project is approval of Re Installation Restoration Site 30 (Daycare Center) Treasure Island, San Francisco, California.		
The proposed project consists of institutional conimpacted soil at Site 31. Both sites are located in 1.5-acre site that contains an operating daycare capproximately 2 acres in size and includes a port 11 th Street between Avenue D and E, and the asp Elementary School.	the central part of the former Naval Station T center, located in the central portion of Treasu ion of a parking lot on the northeast corner of	reasure Island. Site 30 is a re Island. Site 31 is 11th Street and Avenue E,
Finding Of Significant Effect On Environment: (Ar	n Initial Study supporting this finding is attache	ed.)
Based on the analyses and conclusions found in have a significant effect on the environment.	the attached Initial Study, DTSC finds that the	e proposed project could not
Mitigation Measures:		
DTSC has determined that the project does not repart of the project description.	equire any additional mitigation measures bey	ond those incorporated as
Branch Chief Signa	ature	Date
Branch Chief Name	Branch Chief Title	Phone #

CALSTARS CODING:

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq.] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.].

CALSTARS CODING.				
Site Code: 201210				
Work Phase: 18				
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3				
Other (specify):				
☐ California H&SC, Chap. 6.5 ☐ California H&SC, Chap. 6.8 ☐ Other (specify):				
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PROJECT DESCRIPTION:

DDO IECT TITLE:

The project is approval of Remedial Action Plans for remediation of the Naval Station Treasure Island Installation Restoration Site 30 (Daycare Center) and Site 31 (Former South Storage Yard) at the Former Naval Station Treasure Island, San Francisco, California.

The proposed project consists of institutional control implementation at Site 30 and excavation and off-site disposal of impacted soil at Site 31. Both sites are located in the central part of the former Naval Station Treasure Island (Figure 1). Site 30 is a 1.5-acre site that contains an operating daycare center, located in the central portion of Treasure Island (Figure 2). Site 31 is approximately 2 acres in size and includes a portion of a parking lot on the northeast corner of 11th Street and Avenue E, 11th Street between Avenue D and E, and the asphalt-paved schoolyard of the recently closed Treasure Island Elementary School (Figure 3).

The proposed project for Site 30 will address potential human health risk from direct contact with potentially impacted soil beneath the Daycare Center Building 502 and Site 30 Concrete Pad (Figure 2). Dioxins as high as 34.1 nanograms per kilogram (ng/kg) were the only identified chemicals of concern (COCs) identified in the Remedial Investigation (RI) Report (SulTech 2006) for Site 30. Risk assessment results indicate that there are no unacceptable risks for the current and planned future use of Building 502 on Site 30 as a daycare center. Estimated excess cancer risk for a daycare center child, construction worker, a hypothetical future commercial/industrial worker, and child/adult resident were within EPA's risk management range (maximum excess cancer risk of one in 100,000), and the non-cancer hazards (the likelihood of illness or injury other than cancer) did not exceed the level the EPA considers safe. However, there is a need to prevent exposure to potentially contaminated soils beneath Building 502 and Site 30 Concrete Pad since the nature and extent of contamination in that soil has not been characterized. The proposed remedy will reduce potential risks to human health by

implementing both engineering and institutional controls.

Engineering controls will include annual inspection and ongoing maintenance of the existing Building 502 slab and Site 30 Concrete Pad that serve as an effective exposure prevention barrier. Institutional controls would restrict any removal or penetration of the exposure barrier, except when following specific guidelines to prevent exposure to potentially contaminated soil. Site 30's Building 502 Daycare Center building was constructed in the 1980s and built in accordance with the seismic code at that time. The building slab concrete is reinforced with rebar and did not sustain any damage during the Loma Prieta earthquake in 1989. Therefore, Building 502 and the concrete slab are expected to withstand any potential future seismic event(s).

If utility repairs (such as water or sewer repairs) are required, measures would be implemented to prevent exposure of the occupants and workers to potentially contaminated soil. Institutional controls would include:

- A "Covenant to Restrict Use of Property, Environmental Restriction" to (1) prohibit any removal or penetration of the Building 502 slab and Site 30 Concrete Pad, (2) require periodic inspection and reporting of the Building 502 slab and Site 30 Concrete Pad with provisions for making utility repairs, as necessary, and (3) require remedial investigation and any necessary remediation beneath Building 502 and the Site 30 Concrete Pad upon building demolition and pad removal.
- An Implementation and Enforcement Plan to specify the roles and responsibilities for implementing, monitoring, and enforcing the covenant provisions.
- A Deed Notice to notify the public of the existence of potential contamination.

Implementation of engineering and institutional controls at Site 30 would prevent exposure to potentially contaminated soils beneath the Building 502 slab and Site 30 Concrete Pad for current daycare center children and workers as well as future occupants and utility workers. Engineering and institutional controls for Site 30 are being evaluated and implemented through the National Contingency Plan remedial process (RI/FS, Proposed Plan, Remedial Action Plan, and Record of Decision).

The proposed project for Site 31 will address potential human health risks from direct contact with potentially impacted soil beneath the currently paved elementary schoolyard and 11th Street between Avenue's D and É. Risk assessment results determined that excess cancer risk for hypothetical child/adult resident and commercial/industrial worker were within the cancer risk management range using the Federal risk calculation method (one potential excess cancer risk in 100,000), but above the risk management range using the State method (one potential excess cancer risk in one million). Non-cancer hazards were below EPA's non-cancer hazard index (HI) threshold of 1 for all receptors except hypothetical residents and commercial/industrial workers. The proposed remedy will reduce potential risks to human health by excavating and removing debris and contaminated soil from the site. Once implemented, the proposed removal action will eliminate the exposure pathways for current and future land use scenarios to the COCs identified in the Feasibility Study (FS) (SulTech 2007). The COCs identified at Site 31 include polycyclic aromatic hydrocarbons (PAHs) up to 35.22 milligrams per kilogram (mg/kg) benzo(a)pyrene equivalents, motor oil up to 13,000 mg/kg, diesel up to 5,100 mg/kg, dioxins up to 60.8 ng/kg, copper up to 57,000 mg/kg, and lead up to 9,100 mg/kg. The proposed cleanup activities for Site 31 include removal and disposal of contaminated soils from Debris Areas A, B, C, D, and E to a depth of six feet below ground surface, and backfilling with clean fill (Figure 3). The proposed action for Site 31 consists of the following seven tasks: (1) Mobilization, (2) Site Preparation, (3) Excavation of Soil and Debris, (4) Confirmation Soil Sampling, (5) Transportation and Disposal of Soil to an Off-Site Permitted Landfill, (6) Site Restoration, and (7) Demobilization. These tasks are summarized below.

Task 1 – Mobilization

The mobilization for the proposed remedy will involve completion of the following activities:

- Residents will be notified of the planned excavation through a fact sheet, public meeting, and work notices.
- Pre-excavation grades and conditions will be documented.
- Underground utility clearance surveying will be conducted.
- An exclusion zone, decontamination area, and general work areas for the excavation, hauling, loading, and weighing of the soil and solid waste will be established.
- Polyethylene liners will be installed in areas where excavated soil will be stockpiled pending final disposal.
- Storm drains within the excavation areas and stockpile areas will be bermed or otherwise protected, as necessary, to prevent stormwater runoff from reaching the San Francisco Bay in accordance with the stormwater management plan.
- Measures will be taken to prevent off-site migration of stormwater. If necessary, excess stormwater may be disposed of at the on-site wastewater treatment plant.
- Dust suppression measures will be implemented and dust monitoring equipment will be placed along the

perimeter of the excavation areas.

Equipment and trucks will access the work site via the truck route identified on Figure 4. Portions of the northern corner of 11th Street and Avenue M will serve as a truck staging area. The truck loading area and vehicle decontamination pad will be located within the boundaries of Site 31.

Task 2 – Site Preparation

A temporary 6-foot-high chain-link security fence will be installed around Site 31 to prevent unauthorized access during remedial activities and to protect the public from hazards associated with construction equipment. One local residential street, 11th Street, will be closed between D and E Streets for approximately four months, including the intersection of 11th and E Streets. Traffic is light, posted speeds are low and there is good visibility on roads and intersections. Flagman and traffic detour signage will be used where needed.

Task 3 – Excavation

Excavation will occur in Debris Areas A, B, C, D, and E (Figure 3). Sidewalks in the Debris Areas adjacent to roadways are considered part of the roadway and will be excavated. Excavations will be advanced to a depth of approximately six feet below ground surface, conservatively selected to allow for over-excavation in areas of known contamination. The depth of excavation may require a moderate amount of mechanical support or removal and replacement of underground utilities. Hand digging may be required to remove impacted soil in close proximity to the utilities. Utilities encountered will either be temporarily rerouted to allow excavation to continue or temporarily supported during excavation activities.

The estimated lateral extent of the excavation for Site 31 is shown on Figure 3. The actual lateral extent of the excavation will be based on the presence of chemical and physical hazards in the sidewalls, as determined by confirmation sampling. Up to 930 cubic yards of asphalt and concrete (demolition debris) would require disposal as nonhazardous waste and up to 6,080 cubic yards of contaminated soil would require disposal as hazardous waste. Total material removed will be up to 7,010 cubic yards of contaminated soil and debris, which corresponds to approximately 390 truckloads (18-cubic-yard capacity trucks).

The Draft Remedial Action Plan for Site 31 includes elements that will be taken during excavation, staging, and loading of contaminated soil to reduce and control short-term risks resulting from inhalation of fugitive dust and direct contact with excavated soil. Risks will be minimized through use of dust suppression measures (such as water and physical barriers) and prevention of unauthorized access to work areas. Dust monitoring equipment will be used, and the on-site health and safety officer will provide continuous visual monitoring. Air quality monitoring equipment will consist of personal data rams (PDRs) calibrated to record real-time total dust concentrations. At least four PDRs will be used at each excavation: one will be stationed outside and downwind of the excavation, a second PDR will be carried by a worker or within construction equipment (at locations considered to be most likely to be exposed to lead-impacted dust), a third PDR will be operated at an upwind location, and a fourth PDR will be operated between the Site 31 excavation and the Daycare Center Building 502. PDR monitoring results will be checked frequently during each day. The Navy will revise the construction and/or engineering controls to limit further emissions, if airborne dust concentrations: (a) exceed 2.5 milligrams per cubic meter (mg/m³) for a sustained interval (5 readings sustained for one minute or more above the action level during a 15 minute time span) within the exclusion zone, or (b) exceed 1.0 mg/m³ at or beyond the exclusion zone perimeter. Trucks will be decontaminated before they leave controlled areas to avoid unintentional spreading of impacted soil off site. Contact with exposed utilities will be avoided.

It is anticipated that an excavator, backhoe, and a front-end loader at each Debris Area will complete excavation activities and all fieldwork activities will be completed in approximately 4 months. Personnel will excavate the site in modified Level D personal protective equipment, which includes blue tyvek, rubber booties over steel-toed boots, latex gloves, hard hats, and safety glasses.

Task 4 – Confirmation Sampling

The extent of contamination and completeness of the remedial action will be verified by collecting soil samples for analysis to confirm concentrations of COCs meet the following action levels:

COCsAction Levels (cleanup goals)Dioxins12 nanograms per kilogram (ng/kg)Copper3,000 millgrams per kilogram (mg/kg)Lead400 mg/kgMotor Oil1,900 mg/kgDiesel1,380 mg/kgPAHs as Benzo(a)Pyrene Equivalent0.62 mg/kg

These action levels represent allowable maximum COC concentrations at any single location. After remedial activities are completed for Site 31, unrestricted land use will be achieved.

Confirmation samples will be collected at the base and sidewalls of the excavation. If analytical results for the confirmation samples indicate a greater area of contamination than was initially expected, the Navy may choose to remove additional material. No contamination will be left in place exceeding action levels. A more detailed discussion will be presented in the sampling and analysis plan that will be developed for the Remedial Design. Quality assurance and guality control samples also will be collected.

Task 5 – Transportation and Disposal

Excavated soil and debris will be hauled to appropriate off-site permitted landfills via trucks. However, based on existing soil data for metals, it is likely that some of the excavated material will be hauled to a Class I (hazardous waste) landfill. Therefore, it is assumed that approximately 65 percent of the waste will be disposed of in a Class I landfill facility and 35 percent in a Class II landfill facility.

An estimated maximum of 7,010 cubic yards of contaminated soil and debris will be removed during remediation of Site 31 Debris Areas A, B, C, D, and E, which corresponds to approximately 390 truckloads (18-cubic-yard capacity trucks), will be transported off-site during the 4-month (i.e., 80 days) fieldwork phase in spring 2009. This represents 390 truck round trips during the 4-months, or approximately five truck round trips per day. With five trucks of contaminated soils leaving Treasure Island per day and an equal number of trucks delivering clean soils daily to the Island, there are 20 truck trips (two per each round trip) per day during the 4-months. In an eight-hour day, one truck will be coming on the Island every 48 minutes and one truck will be leaving the Island every 48 minutes on average. Truck and equipment tires exiting the excavation areas will be brushed to remove soil and debris prior to leaving the site.

Task 6 - Site Restoration

The excavated areas will be backfilled with clean soil and graded to reestablish the existing grade to the extent practicable. A new roadbase and asphalt surface will be installed in accordance with City of San Francisco construction requirements. Replacement of the asphalt schoolyard, street, and the parking lot are included in this alternative.

Task 7 – Demobilization

Upon completion of the Tasks 1 through 6, equipment will be decontaminated before leaving the site, demobilized, and all staging areas and work sites associated with the remedial action will be cleared of remedial action-related equipment and signage.

This proposed remedy will comply with all identified applicable or relevant and appropriate requirements, will reduce the on-site volume of contaminated soil, is technically feasible, and is easy to implement. Contractors are readily available and have the equipment and expertise necessary to excavate contaminated soil, and the capacity of the off-site disposal facilities is adequate to handle the volume of excavated soil. Non-hazardous soil and demolition debris will be taken to Forward (Stockton, CA) and Altamont (Livermore, CA) Landfills while hazardous soil and debris will be disposed at Kettleman Hills (Kettleman City, CA). The proposed project activities at Site 31 are expected to require a total of approximately four months beginning in spring 2009 to mobilize necessary equipment, prepare the site for excavation, excavate impacted soil, transport and dispose of excavated soil off site, restore the site, and demobilize equipment from the site.

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact:

• There are no Site 30 project activities that would create an impact on aesthetics. The Site 30 remedy includes Institutional Controls only. Consequently, no further analysis is deemed necessary.

For Site 31, the following activities would create temporary impacts:

- Presence and operation of construction equipment at Site 31.
- Installation of a temporary 6-foot-high chain-link fence at each Debris Area excavation within Site 31
- Placement of a temporary berm or other protective measures at a storm drain within the excavation areas and stockpile areas.

- Temporary covering of windows, vents, doors, and all openings with tarps at buildings adjacent to the excavation
- Temporary soil stockpiles, debris stockpiles areas within Site 31.

Description of Baseline Environmental Conditions:

The remediation areas are located within an urbanized area in the central portion of Treasure Island, on San Francisco Bay, midway between the Cities of San Francisco and Emeryville/Oakland. The sites are over one mile north of the San-Francisco Oakland Bay Bridge (I-80). The existing Site 30 consists of a single-story operating childcare facility. The existing Site 31 consists of a closed elementary school yard, a portion of a parking lot on the northeast corner of 11th Street and Avenue E, and 11th Street between Avenue D and E. Both Sites have open space with natural sunlight. The grade surface is flat with few large trees and is generally well lit

Analysis as to whether or not project activities would:

Have a substantial adverse effect on a scenic vista.

Impact Analysis: Sites 30 and 31 are located in the central portion of Treasure Island within an urbanized area. Treasure Island is located on San Francisco Bay, midway between the cities of San Francisco and Emeryville/Oakland. There is no existing scenic vista. The implementation of engineering and institutional controls at Site 30 will have no effect on scenic vistas. Trucks, portable tanks and construction equipment will be present during

	the proposed cleanup activities for Site 31. Excavated soil, concrete, asphalt and debris will be temporarily stockpiled at Site 31. Excavations will be completed and backfilled within an approximate four-month period and will not have a long-term adverse effect on the area aesthetics.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.
	Impact Analysis: The project site is not within the corridor of a designated state scenic highway. The nearest historical buildings on Treasure Island are Buildings 1, 2, and 3, approximately 900 yards south of the site. As mentioned in item a. above, Site 31 will be restored to current conditions at the end of the project.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
C.	Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact Analysis: At Site 30, onsite activities will be limited to inspection of the Building 502 slab and Site 30 Concrete Pad. At Site 31, the project will involve removing contaminated soil, concrete, and asphalt debris from the five Debris Areas. The visual character or quality of the site and its surroundings will be temporarily disturbed during the 4-month project implementation period. However, site restoration will be performed upon completion of Site 31 removal activities. All stockpiled contaminated soil and debris will be shipped off-site within the 4-month project duration to permitted treatment, storage, and disposal facilities. All stockpiled clean soil will be used to backfill the excavation within the 4-month project duration. Therefore, no permanent changes to visual character or quality of the site will occur.

Conclusion	n:		
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		cant Impact	
■ No Imp	act		

d. Create a new source of substantial light of glare that would adversely affect day or nighttime views in the area.

	Impact Analysis: Project activities will be implemented during daylight hours and do not involve the use of artificial lighting.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
1.	ferences Used: SulTech, 2006. Final Remedial Investigation Report, Installation Restoration Site 30, Daycare Center, Naval Station easure Island, San Francisco, California, February.
	SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure and, San Francisco, California, November 16.
	SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval tion Treasure Island, San Francisco, California, February.
2.	Agricultural Resources
Pro	ject Activities Likely to Create an Impact:
	The Site 30 and 31 projects do not have any activity that would create an impact on agricultural resources.
De	scription of Baseline Environmental Conditions:
	The project area is not located on or in proximity to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The site is situated on filled baylands from dredged bay sediment. Treasure Island was originally constructed in 1937 for use as an airport, had an interim use for the 1939-1940 Golden Gate International Exposition and was later used by the U.S. Navy from 1940 until the base closed in 1997. Current land use at Site 30 includes the Daycare Center building, parking lot, and yard. Current land use at Site 31 includes part of a parking lot on the northeast corner of 11 th Street and Avenue E, a roadway (11 th Street between Avenue D and E), and an asphalt-paved schoolyard.
	The project area is not located on or in proximity to land zoned for agriculture use, or under Williamson Act contract.
An	alysis as to whether or not project activities would:
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
	Impact Analysis: None. No past or designated agricultural use.
	Conclusion: ☐ Potentially Significant Impact ☐ Potentially Significant Unless Mitigated ☐ Less Than Significant Impact ☐ No Impact
b.	Conflict with existing zoning or agriculture use, or Williamson Act contract.
	Impact Analysis: No impact.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

C.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.
	Impact Analysis: No impact. There is no Farmland at the project area.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

References Used:

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.

3. Air Quality

Project Activities Likely to Create an Impact:

• There are no Site 30 project activities that would create an impact on air quality. The Site 30 remedy includes Institutional Controls only. Consequently, no further analysis is deemed necessary.

For Site 31, the following activities would create temporary impacts:

- Presence and operation of construction equipment at Site 31.
- Generation of fugitive dust and particulates at the excavation zone, decontamination areas, general work areas, stockpile areas, truck loading areas, truck staging/parking areas, and truck routes.
- Covering of windows, vents, doors, and all openings with tarps at buildings adjacent to the excavation areas.
- Excavation of contaminated soils by using appropriate construction equipment (may include excavator, backhoe, and front-end loader), and loading excavated soil and debris onto dump trucks.
- Transportation of contaminated soil and debris to appropriate off-site permitted treatment, storage, and disposal facilities.
- Transportation of clean-fill material from off-site locations onto Treasure Island.
- Transportation of backfill material from its staging areas on the Island to the excavation areas and placement therein.
- Backfill of all excavated areas using clean soils and subsequent soil compaction to meet construction standards.

Description of Baseline Environmental Conditions:

The proposed project is located within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The BAAQMD is responsible for enforcing, within its jurisdiction, air quality standards established by the California Air Resources Board (CARB) and the federal Environmental Protection Agency (EPA). These air quality standards contain averaging times and threshold concentration levels for certain criteria pollutants that cannot be exceeded by proposed projects.

The BAAQMD falls within the San Francisco Bay Area Air Basin (SFBAAB). The SFBAAB has been designated by the CARB as being in non-attainment with California Ambient Air Quality Standards (CAAQS) for ozone and for particulate matter less than 10 microns (PM10). The federal EPA has designated the SFBAAB as being in non-attainment with Federal Ambient Air Quality Standards (FAAQS) for ozone.

Since ozone and PM10 have been identified as non-attainment in the SFBAAB, specific standards were developed by the BAAQMD to control sources of these pollutants from proposed future projects. Further, because ozone is an identified non-attainment pollutant, standards are also required for ozone precursors such as carbon monoxide (CO) and volatile organic compounds (VOCs). The BAAQMD established such standards for projects proposed within its jurisdiction. Regulation 6 of the BAAQMD regulations limits particulate matter by emission rate, while Regulation 8 limits the emissions of organic pollutants (CO and VOCs). In addition, odorous substances are regulated by the BAAQMD under Regulation 7. During the 4-month excavation and backfilling for Site 31, there will be approximately five trucks hauling contaminated soil from Treasure Island and five trucks delivering clean fill to the Island each day. The additional truck traffic will not cause exceedance of the BAAQMD regulations limits. Control measures

recommended by the BAAQMD for reduction of PM10 that will be implemented in the proposed project include watering all active construction areas, covering all trucks hauling soil and other loose materials, applying water on all unpaved access roads, parking areas, and staging areas, street sweeping with wet water sweepers if visible soil material is carried onto adjacent public streets and daily water sweeping all paved access roads, parking areas, and staging areas. Truck and equipment tires exiting the excavation areas will also be brushed to remove soil and debris prior to leaving the site.

No equipment or processes that would be a stationary or mobile source of emission or odors will be used for the proposed project at Site 30. However, for Site 31, stationary and mobile sources of air emissions and odor include excavation and stockpiling of contaminated soil, concrete, asphalt and debris using appropriate construction equipment, which may include excavator, backhoes, and bulldozers, and loading contaminated media into 18-wheel trucks and dump trucks. Site restoration will include backfill of all excavated areas with clean fill as well as off-site transport to an appropriate facility based on waste characterization. The BAAQMD exempts certain operations, under Regulation 2, from obtaining air permits. Prior to initiating various phases of removal action activities, the Navy will send written notification to the BAAQMD notifying of the intent to remove contaminated soil (BAAQMD Regulation 8, Rule 40). DTSC will also require an air monitoring plan in the Remedial Design to minimize the air quality impacts caused by the project activities.

The site is not a source of naturally occurring asbestos. The site's soil is fine grained dredged San Francisco Bay sediment. No ultramafic rocks likely to contain naturally occurring asbestos are illustrated in the ARB map entitled, "General Location Guide for Ultramafic Rocks in California-Areas Most Likely to Contain Naturally Occurring Asbestos".

Analysis as to whether or not project activities would:

a. Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis: The BAAQMD regulations specify standards for fugitive dust emissions and particulate matter emissions. The BAAQMD exempts certain operations, under Regulation 2, from obtaining air permits.

Airborne dust will be visually monitored on a continual basis. Water spray and careful soil handling will be used to prevent airborne dust from reaching workers' breathing zones and to prevent dust from escaping the perimeter of the Exclusion Zone. In addition, real-time air monitoring instrumentation will be used to document that all field personnel are adequately protected from airborne contaminants.

Real-time monitoring for dust will be performed in the work areas where the potential for the highest concentrations of dust are expected during activities that may have the potential for dust hazard, such as clearing, excavation, loading and unloading trucks, and stockpiling. A personal data-logging real time data logger will be used to monitor for dust in the work area, on the downwind boundary of the site, as well as between the Site 31 excavation and the Daycare Center Building 502. The site specific actions levels for dust are 2.5 mg/m³ for worker areas and 1.0 mg/m³ for the exclusion zone perimeter. The action levels are based on the lead concentrations in the soil since lead has the highest soil concentration to permissible exposure level ratio, thereby introducing an extra margin of safety for the other constituents.

Control measures recommended by the BAAQMD for reduction of PM10 that will be implemented in the proposed project include watering all active construction areas, covering all trucks hauling soil and other loose materials, applying water on all unpaved access roads, parking areas, and staging areas, street sweeping with wet water sweepers if visible soil material is carried onto adjacent public streets and daily water sweeping all paved access roads, parking areas, and staging areas. Water will be available at all times during excavation, soil handling and loading activities. Implementation of these control measures will result in air pollutant emissions from proposed activities that would be considered a less than significant impact.

DTSC will also require the Navy to comply with an air monitoring plan, which is an integral part of the Remedial Design. Therefore, project activities during the 4-month implementation period would not have a conflict with or obstruct implementation of the applicable air quality standard.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ No Impact

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Impact Analysis: The implementation of engineering and institutional controls at Site 30 would not conflict with or obstruct implementation of the applicable air quality plan, as no onsite activities are planned other than inspection of the Building 502 slab and Site 30 Concrete Pad. Project activities are under the regulatory authority of the BAAQMD and compliance with their standards will not create a violation. Dust monitoring will be performed during activities at Site 31 that might create dust, such as excavation, stockpiling, loading, and backfilling.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ No Impact

c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact Analysis: Project activities will not create a violation of emissions standards and emissions will be temporary and short-term in nature. Therefore, there will be no net increase of any criteria pollutant or ozone precursor during project activities.

Emissions of construction activities including emissions of ozone precursors are part of the emission inventory that is the basis for the regional air quality plans. Therefore, the emissions from the project will not result in a net increase or impede the attainment or maintenance of ozone and nitrogen oxides standards in the Bay Area.

Particulate matter control measures recommended by BAAQMD will ensure the PM10 emissions will not result in a significant increase.

DTSC will require the Navy to comply with an air monitoring plan, which is an integral part of the Remedial Design. Therefore, project activities during the 4-month implementation period would not result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Co	nclusion:			
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	Potentially	Significant	Unless	Mitigated
X	Less Than	Significant	Impact	
	No Impact			

d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis: The BAAQMD defines sensitive receptors as the elderly, children, infirm or persons with a particular sensitivity to air pollutants. The sensitive receptors in the project vicinity are occupants of the housing and the daycare center at Site 30.

The project is not expected to expose these sensitive receptors to substantial pollutant concentrations for the following reasons:

- The project will be taking place within a defined exclusion zone. There will be no occupants within the exclusion zone.
- 2) Actual excavation and backfill activities at Site 31will take approximately four months.
- 3) Standard construction practices will be used for dust suppression.
- 4) The project will include covering of windows, vents, doors, and all openings with tarps at buildings adjacent to the excavation areas, thereby reducing the potential for sensitive receptors at nearby occupied housing from dust and particulate exposure.
- 5) Air quality monitoring equipment will consist of personal data rams (PDRs) calibrated to record real-time total dust concentrations. At least four PDRs will be used at each excavation: one will be stationed outside and downwind of the excavation, a second PDR will be carried by a worker or within construction equipment (at locations considered to be most likely to be exposed to lead-impacted dust), a third PDR will be operated at an upwind

location, and a fourth PDR will be operated between the Site 31 excavation and the Daycare Center Building 502. PDR monitoring results will be checked frequently during each day.

DTSC will require the Navy to comply with an air monitoring plan, which is an integral part of the Remedial Design. Therefore, project activities during the 4-month implementation period would not expose sensitive receptors to substantial pollutant concentrations.

Сс	nclusion:			
	Potentially	Significant	Impact	
	Potentially	Significant	Unless	Mitigated
\boxtimes	Less Than	Significant	Impact	
	No Impact	-		

e. Create objectionable odors affecting a substantial number of people.

Impact Analysis: Odorous substances are regulated by BAAQMD under Regulation 7. The air monitoring plan of the Remedial Design will ensure compliance of Regulation 7. The project site is an open area where odors will be able to quickly dissipate. DTSC will require the Navy to comply with an air monitoring plan, which is an integral part of the Remedial Design. Therefore, project activities during the 4-month implementation period would not create objectionable odors affecting a substantial number of people.

Conclusion:	
☐ Potentially Significant Impact	
☐ Potentially Significant Unless	Mitigated
Less Than Significant Impact	_
⊠ No Impact	

Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).

Impact Analysis: The site is not a source of naturally occurring asbestos. The site's soil is fine grained dredged San Francisco Bay sediment. No ultramafic rocks likely to contain naturally occurring asbestos are illustrated in the ARB map entitled, "General Location Guide for Ultramafic Rocks in California-Areas Most Likely to Contain Naturally Occurring Asbestos".

Conclusion:

	Potentially	Significant	Impact	
	Potentially	Significant	Unless	Mitigated
	Less Than	Significant	Impact	
\boxtimes	No Impact			

References Used:

- 1. SulTech, 2006. Final Remedial Investigation Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, February.
- 2. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 3. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 4. Bay Area Air Quality Management District 1999. BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans, Prepared by the Planning and Research Division of the BAAQMD. San Francisco, California, December.
- 5. CARB map entitled, "General Location Guide for Ultramafic Rocks in California-Areas Most Likely to Contain Naturally Occurring Asbestos". SulTech, 2006. Final Remedial Investigation Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, February.

4. Biological Resources

Project Activities Likely to Create an Impact:

The project does not have any activity that would create an impact on biological resources because Site 30 does not involve any earth disturbance, and Site 31 does not provide suitable habitat value.

Description of Baseline Environmental Conditions:

SulTech, Final Feasibility Study Report, Installation Restoration (IR) Site 30 (2006), Site 30 is inland and does not contain riparian/wetland areas. The shortest distance between Site 30 and the San Francisco Bay is approximately 1,200 feet. The Site is located in an industrialized, disturbed area devoid of habitat value.

According to the SulTech Final Feasibility Study Report for Installation Restoration (IR) Site 31 (2007), the terrestrial habitat of TI is generally of poor quality for wildlife species because Treasure Island is predominantly covered by urban development. Approximately 90 percent of the site is paved, covered with the asphalt schoolyard, streets, and sidewalks. The remaining 10 percent of the site consists of narrow strips of landscaped areas between the schoolyard and the streets. The future reuse of IR Site 31 is to remain an asphalt-paved schoolyard. The southeast quadrant of the site is slated for recreational development. Neither of these reuse scenarios would enhance or create sufficient quality habitat to sustain populations of wildlife.

Sites 30 and 31 do not contain any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service that may be present at or in close proximity. The sites are upland and therefore do not have any federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) that may be present at or in close proximity. The shortest distance between Site 31 and the San Francisco Bay is approximately 1,240 feet. The sites do not have any native resident, migratory fish, wildlife species, nursery sites or corridors that may be present at or in close proximity. The Site is located in an industrialized, disturbed area and does not provide habitat value.

A Department of Fish and Game Natural Diversity Database report for the Oakland West quadrant was reviewed. The species listed in the report inhabit the following habitat types: woodland, floodplain, vernal pools, foothill grassland, alkali playa, marshes, swamps, coastal scrub, coastal dunes, and brackish water. The only sighting is for blue coast gilia, Gilia capiata ssp. chamissonis near Naval Station Treasure Island is at Yerba Buena Island, below Treasure Island. No sightings in the project site area were included in the March 30, 2008 report data.

No local policies or ordinances, such as a tree preservation policy, protecting biological resources that may be present at or in close proximity to the sites. The sites do not have any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that may be applicable to biological resources present at or in close proximity.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis: Because of the artificial and disturbed nature of ecological habitat at Treasure Island, ecological exposure of plants and invertebrates to contaminated soil is limited to those species that can adapt to urbanized environments. No complete exposure pathways exist to ecologically sensitive ecosystems or receptors according to the Feasibility Studies conducted for Sites 30 and 31. Remedial action activities for Site 31 will not affect ecological receptors. Therefore, the project will not have a substantial adverse effect, either directly or indirectly or through habitat modifications, on any species identified as a candidate, sensitive or special status species.

Со	nclusion:		
	Potentially	Significant Impact	
	Potentially	Significant Unless	Mitigated
	Less Than	Significant Impact	_
\boxtimes	No Impact		

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

References Used:

Treasure Island, San Francisco, California, February.

will result from the Site 30 or 31 remedies. Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Impact Analysis: There are no wetlands within or adjacent to the project sites. Therefore, federally protected wetlands will not be impacted by activities performed at Site 31. Conclusion: ☐ Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
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 No Impact
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 No Impact
 No Impa Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impact Analysis: No fish or wildlife species are present within the Site 30 and 31 boundaries. No areas within the project boundaries are known to contain any migratory wildlife corridors. Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impact Analysis: There are no local policies or ordinances protecting biological resources at Sites 30 or 31. Conclusion: ☐ Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Impact Analysis: There is no approved local, regional or state habitat conservation plan that covers Sites 30 or 31. Conclusion: ☐ Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
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 No Impact
 No Impact
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 No Impact
 No Impact

Impact Analysis: As stated in the Baseline Environmental Conditions, no riparian habitat or other sensitive natural communities are present within the Sites 30 or 31 project boundaries. Consequently, no effects to riparian habitats

1 SulTech, 2006. Final Remedial Investigation Report, Installation Restoration Site 30, Daycare Center, Naval Station

- 2. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 3. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 4. California Department of Fish and Game Natural Diversity Database report for the Oakland West quadrant, March 30, 2008.

5. Cultural Resources

No Impact

Project Activities Likely to Create an Impact:

The project does not have any activity that would create an impact on cultural resources.

Description of Baseline Environmental Conditions:

Treasure Island was constructed in 1937 from dredged sediment. Site 30 was undeveloped until 1985 when the daycare center was constructed. Site 31 was periodically used for storage, including a fenced storage yard before being paved in the late 1970s for use as a schoolyard. There are no historically significant structures at the sites. The nearest historical buildings on Treasure Island are Buildings 1, 2, and 3, approximately 900 yards south of Site 30.

Because Treasure Island was constructed in 1937 from dredged sediment, no archeological resources are present, no unique paleontological resources or unique geologic features are present, no California Historical Resources Information System inventory search was conducted, and no Registry of Sacred Sites search was conducted.

	Treasure Island has never been used for burials.
An	alysis as to whether or not project activities would:
a.	Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.
	Impact Analysis: No historical resources are present within the project area.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
b.	Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.
	Impact Analysis: Treasure Island was constructed in 1937 from dredged sediment. No archeological resources ar present.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
C.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
	Impact Analysis: No unique paleontological resources or unique geologic features are present.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact

d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:	No human remains are present.	Treasure Island has never been used for burials.
Conclusion:		
☐ Potentially Signature	gnificant Impact	
☐ Potentially Signature	gnificant Unless Mitigated	
Less Than Sig	gnificant Impact	

References Used:

No Impact
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 No Impact
 No Impact
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 No Impact
 No Impact

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.

6. Geology and Soils

Project Activities Likely to Create an Impact:

• There are no Site 30 project activities that would create an impact on geology and soils. The Site 30 remedy includes Institutional Controls only. Consequently, no further analysis is deemed necessary.

For Site 31, the following activities would create temporary impacts:

- Presence and operation of construction equipment at Site 31.
- Placement of berm or other protective measures at storm drain within the excavation areas and stockpile areas.
- Excavation of contaminated soils by using appropriate construction equipment (may include excavator, backhoe, and front-end loader), and loading excavated soil and debris onto dump trucks.
- Backfill of all excavated areas using clean soils and subsequent soil compaction to meet construction standards.

Description of Baseline Environmental Conditions:

The project area lies between the San Andreas and Hayward faults. Project site soils are fine grained sediments. Sidewall sloping will be utilized starting at three feet below ground surface and excavations will be a maximum of six feet below ground surface. The site is not located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994). Any waste water generated will be discharged to the Treasure Island sewage treatment plant. The project area is flat.

Analysis as to whether or not project activities would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).
- Strong seismic ground shaking.
- Seismic-related ground failure, including liquefaction.
- Landslides.

Impact Analysis: Project site soils are fine grained sediments. Sidewall sloping will be utilized starting at three feet below ground surface and excavations will be a maximum of six feet below ground surface. Nearby faults have caused severe ground shaking at the site in the past and could occur in the future. The potential impacts of this ground shaking include liquefaction of soils. The project activities will not cause strong seismic ground shaking which would expose people or structures to potential substantial adverse effects. Site 30's Building 502 Daycare Center building was constructed in the 1980s and built in accordance with the seismic code at that time. The building slab

	Therefore, Building 502 and the concrete slab are expected to withstand any potential future seismic event(s).
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
b.	Result in substantial soil erosion or the loss of topsoil.
	Impact Analysis: The project site is relatively flat; therefore there is no anticipated threat of soil erosion. Excavations will be backfilled to grade or near grade. Best practices will be used to protect stormwater and prevent stormwater runoff from reaching the San Francisco Bay in accordance with the stormwater management plan
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
C.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
	Impact Analysis: The project site is relatively flat. Project activities are not expected to result in an off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Excavations will be backfilled with clean imported fill materials, compacted, and will be restored to grade or near grade.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
	Impact Analysis: The project site is relatively flat and is not located on expansive soil. Therefore, the project will not create substantial risks to life or property.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.
	Impact Analysis: Sewers are available for disposal of water and are capable of supporting the project.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
f.	Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).

Impact Analysis: The site is not a source of naturally occurring asbestos. The site's soil is fine grained dredged San Francisco Bay sediment. No ultramafic rocks likely to contain naturally occurring asbestos are illustrated in the ARB

map entitled, "General Location Guide for Ultramafic Rocks in California-Areas Most Likely to Contain Naturally Occurring Asbestos".
Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

References Used:

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 3. CARB map entitled, "General Location Guide for Ultramafic Rocks in California-Areas Most Likely to Contain Naturally Occurring Asbestos". SulTech, 2006. Final Remedial Investigation Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, February.

7. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

Potential damage to the Site 30 concrete slab that overlies the Site and provides a protective cap.

For Site 31, the following activities would create temporary impacts:

- Presence and operation of construction equipment at Site 31.
- Generation of fugitive dust and particulates at excavation zone, decontamination areas, general work areas, stockpile areas, truck loading areas, truck staging/parking areas, and truck routes.
- Excavation of contaminated soils by using appropriate construction equipment (may include excavator, backhoe, and front-end loader), and loading excavated soil and debris onto dump trucks.
- Transportation of contaminated soil and debris to appropriate off-site permitted treatment, storage, and disposal facilities.

Description of Baseline Environmental Conditions:

Past land use of Site 30 was as an undeveloped parcel (TI parcel T094) until 1985 when developed by the Navy for a child care facility until base closure in 1997. The City and County of San Francisco began leasing the property in 1997 and the facility reopened as the currently active daycare center in 2003. There will be no transport, use, or disposal of hazardous materials for the proposed remedy at Site 30. Site 30's Building 502 Daycare Center building was constructed in the 1980s and built in accordance with the seismic code at that time. The building slab concrete is reinforced with rebar and did not sustain any damage during the Loma Prieta earthquake in 1989. Therefore, Building 502 and the concrete slab are expected to withstand any potential future seismic event(s).

The Site 30 Feasibility Study discusses the implementation of institutional and engineering controls to provide for evaluation and maintenance of the Building 502 slab and Site 30 Concrete Pad to prevent potential contact with unknown concentrations of dioxins beneath the slab and pad. Institutional controls would include (1) a "Covenant to Restrict Use of Property, Environmental Restriction" to prohibit any removal or penetration of the Building 502 slab and Site 30 Concrete Pad, (2) an Implementation and Enforcement Plan to specify the roles and responsibilities for implementing, monitoring, and enforcing the covenant provisions, and (3) a Deed Notice to notify the public of the existence of potential contamination. Implementation of engineering and institutional controls at Site 30 would prevent exposure to potentially contaminated soils beneath the Building 502 slab and Site 30 Concrete Pad for current daycare center children and workers as well as future occupants and utility workers. The existing daycare center building slab and pad are considered to be an effective engineering control because of its thickness and construction. Periodic inspections would also be required to verify building slab and pad performance as an effective exposure prevention barrier.

Past land use of Site 31 (TI Parcel T095) was as an exhibit area for the 1939-1940 Golden Gate International Exhibition, storage yard during the early 1970's (known as the South Storage Yard), and then paved over and developed into its current-day condition in the late 1970's as an elementary school yard. The school yard is fenced to the east, south, and west. Site 31 was established in 2003 and the site boundaries revised in 2005 to include portions of 11th Street and Avenue E, associated sidewalks, and a portion of a parking lot on the northeast corner of 11th Street and Avenue E. Site 31 does not include the elementary school buildings or any other building structures. The elementary school located at the site is currently closed. There are no near-term plans for the school to reopen. A portion of the elementary school property, not included within the boundary of Site 31, is being leased by a Boy's and Girl's Club.

Contaminated soil and debris containing lead, copper, PAHs, motor oil range petroleum hydrocarbons, diesel range petroleum hydrocarbons, naphthalene, and dioxins in soil as detailed in the Project Description section of this Initial Study will be excavated to achieve residential cleanup standards as evidenced by confirmation sampling. Excavated soils will be managed as hazardous substances and/or potentially hazardous wastes at Site 31. They will be transported by truck to a permitted landfill for disposal. Non-hazardous soil and demolition debris will be taken to Forward Landfill (Stockton, CA) and Altamont Landfill (Livermore, CA) while hazardous soil and debris will be disposed at Kettleman Hills (Kettleman City, CA). Applicable site controls will be implemented. Site activities will be performed consistent with a site specific health and safety plan.

Aspects of the project that may emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or wastes within one-quarter mile of sensitive receptors (i.e., residents at Site 12, daycare center occupants) include excavation of Site 31 debris areas with soils and debris contaminated with lead, copper, PAHs, petroleum hydrocarbons, naphthalene, and dioxins.

The proposed action for Site 31 consists of (1) Mobilization, (2) Site Preparation, (3) Excavation of Soil and Debris, (4) Confirmation Soil Sampling, (5) Transportation and Disposal of Soil to an Off-Site Permitted Landfill, (6) Site Restoration, and (7) Demobilization. Mobilization will include public notification, placement of dust monitoring equipment, as well as establishment of an exclusion zone, decontamination area, and general work areas for excavation, hauling, loading, and weighing of the soil and solid waste. Site Preparation will include installation of temporary fencing around Site 31 to prevent unauthorized access. Total material removed as a part of Excavation is estimated at up to 7,010 cubic yards of contaminated soil and debris, which corresponds to about 390 truckloads (18-cubic-yard capacity trucks). Confirmation Soil Sampling at the base and sidewalls of the excavation will then be used to verify that no contamination will be left in place exceeding action levels. Excavated soil and debris will then be transported off-site to and disposed an appropriate off-site permitted landfill. Site Restoration will include backfilling of excavated areas with clean soil and grading to reestablish the existing grade to the extent practicable. Demobilization will then decontaminate and clear all remedial action related equipment and signage from the site.

The project site is an active Comprehensive Environmental Response, Compensation, and Liability Act site managed under a Federal Facilities Site Remediation Agreement between the Department of the Navy and DTSC. All work will be done in accordance with a site-specific Health and Safety Plan (HSP), which will be a part of the Remedial Design.

Analysis as to whether or not project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

Impact Analysis: For Site 30, no soils will be disturbed, and waste will be left in a capped condition due to the concrete covering over Site 30. The concrete covering Site 30 has been determined to be an effective barrier against possible exposure to underlying contaminants. The Site 30 remedy includes Institutional Controls only. Also refer to the Project Description section of this Initial Study for a description of the concrete cap features that form a protective barrier.

Excavated soils from Site 31 will be managed as hazardous substances and/or potentially hazardous wastes. Contaminated soils at Site 31 will be removed until the cleanup goals identified in the Project Description section of this Initial Study are achieved. Confirmation sampling will occur to ensure the cleanup goals have been achieved. Applicable site controls will be implemented consistent with the site-specific HSP. The HSP will describe the controls and procedures to be implemented that will minimize the incidents, injury, and health risks associated with the remedial activities conducted at Site 31 and will be prepared according to the requirements of 29 CFR 1910.120, and CCR Title 8 General Industrial Safety Order (GISO) 5192 for work at hazardous waste sites. The HSP will contain, at a minimum, the following elements:

A hazard evaluation;

- Names of key personnel and the site safety coordinator;
- A statement that personnel have completed training required by 29CFR 1910.120 and CCR Title GISO 5192;
- Medical surveillance requirements and personal protective equipment to be used by site personnel;
- The types and frequency of personal and area air monitoring, instrumentation and sampling techniques for monitoring of health and safety;
- Site control measures, including the designation of work zones (e.g., exclusion, contamination-reduction and support zones) and safe work procedures for work near structures or topographic breaks, slopes, wall, etc;
- Management of wastes and decontamination procedures for personnel and equipment;
- Noise and dust control procedures and action levels;
- Site transportation procedures;
- Contingency plans including telephone numbers and contact names; and
- Location and routes to the nearest emergency and non-emergency medical care facilities.

Excavated soil will be transported by truck to a permitted landfill for disposal using an appropriately licensed hauler.

Site 31 project controls for a site-specific HSP, transportation plan, and air monitoring plan are expected to ensure that project impacts will be less than significant. Additionally, the management of hazardous substances and/or potentially hazardous wastes, adherence to site controls and plans, and the limited duration of the excavation/backfill activities (approximately four months) are expected to ensure that no significant hazard to the public or the environment will result from project activities.

Designated truck loading locations within Site 31, a truck staging area, as well as clean-fill staging areas will enable truck drivers to remain in the appropriate areas for limited time periods and minimize the potential for significant hazard to the public or the environment (Figure 4). All trucks hauling soil or other loose materials will also be covered. Truck and equipment tires exiting the excavation areas will be brushed to remove soil and debris prior to leaving the site. The proposed truck transportation route on TI (Figure 4) also has been selected in order to use roads that are less frequently used by the general public so as to minimize the potential for public health and environmental hazards. All trucks that are registered hazardous waste haulers licensed by the State of California are also trained to deal with emergencies.

As mentioned in the Baseline Environmental Conditions, project controls for Site 31 include temporary fencing around the Site to protect the public from on-site hazards. Also refer to the response to item b. below which discusses controls for dust and air quality monitoring.

Co	nclusion:		
	Potentially	Significant Impact	
	Potentially	Significant Unless	Mitigated
\boxtimes	Less Than	Significant Impact	_
	No Impact	-	

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Analysis: The selected remedy proposed for Site 30 is to implement engineering and institutional controls to prevent exposure to the soil beneath the building. There is a potential for exposure to dioxins if the Building 502 slab and Site 30 Concrete Pad are damaged. However, damage is unlikely given the thickness and construction of the slab. Furthermore, any potential damage would be discovered during the periodic inspections to be conducted as part of the engineering controls and steps would be taken to prevent exposure. Additionally, institutional controls would be implemented to inform future building users to take appropriate precautions during any maintenance that may be required to utilities beneath the Building 502 slab and Site 30 Concrete Pad.

Compliance with site-specific HSP, transportation plan, and the Remedial Design would mitigate the potentially significant impact to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment for Site 31. All work will be conducted in accordance with the site-specific HSP. The site-specific HSP will also provide an emergency contingency plan. With the correct implementation of the emergency contingency plan, hazardous releases should be minimized. All trucks are registered hazardous waste haulers licensed by the State of California and are trained to deal with emergencies.

Risks will be minimized through use of dust suppression measures (such as water and physical barriers) and installation of perimeter fencing which will prevent unauthorized access to work areas. Dust monitoring equipment will be used, and the on-site health and safety officer will provide continuous visual monitoring. Air quality monitoring

equipment will consist of personal data rams (PDRs) calibrated to record real-time total dust concentrations. The Navy will revise the construction and/or engineering controls to limit further emissions, if airborne dust concentrations: (a) exceed 2.5 milligrams per cubic meter (mg/m³) for a sustained interval (5 readings sustained for one minute or more above the action level during a 15 minute time span) within the exclusion zone, or (b) exceed 1.0 mg/m³ at or beyond the exclusion zone perimeter.

Co	nclusion:			
	Potentially	Significant Impa	ct	
	Potentially	Significant Unles	ss	Mitigated
\boxtimes	Less Than	Significant Impa	ct	
	No Impact	-		

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within onequarter mile of an existing or proposed school.

Impact Analysis: The project at Site 31 includes excavation of contaminated soils that will be handled as hazardous wastes. The elementary school located at the site has been closed since 2005 and there are no near-term plans for the school to reopen. A Boy's and Girl's Club operates in a portion of the former elementary school and an operating daycare center is located within adjacent Site 30. However, the proposed project activities for Site 30 do not include emissions or handling of hazardous or acutely hazardous materials, substances, or wastes. The distance from Boy's and Girl's club to the proposed Site 31 activities is approximately 120 feet. The measures that will be taken to prevent exposure include establishment of exclusion zones with fencing, dust control, and air monitoring. The site superintendent will be cognizant of wind conditions and will stop work if deemed necessary. Due to the distance of the Boy's and Girl's club from the proposed excavations, covering of windows will not be necessary. Notice to daycare center and Boy's and Girl's Club occupants will also be provided in advance of any field activities.

The project at Site 31 is not expected to expose these sensitive receptors to substantial pollutant concentrations for the following reasons:

- a. The project will be taking place within a defined exclusion zone (fenced and access controlled). There will be no occupants within the exclusion zone.
- b. Actual excavation and backfill activities at Site 31 are temporary and will take approximately four months.
- c. Engineered construction practices will be used for dust suppression, for example, watering trucks will be used during excavation and loading, all stockpiles will be covered with plastic sheeting, and all truck loads will be fully enclosed.
- d. A temporary 6-foot-high chain-link fence will be installed at each excavation to protect the public from construction activities.
- e. Closure of 11th Street between Avenue D and Avenue E will prevent pedestrian trespass.
- f. Dust suppression measures including applying water to active construction areas as well as covering all trucks hauling soil will minimize potential pollutant exposures.
- g. Truck and equipment tires exiting the excavation areas will be brushed to remove soil and debris prior to leaving the site.
- h. Real-time dust monitoring will be conducted to ensure that the appropriate dust control measures are being implemented.
- Confirmation sampling will be conducted to ensure cleanup goals stated in the Project Description section of this Initial Study are met.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ No Impact

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.

Impact Analysis: Sites 30 and 31 are included on the hazardous waste and sites list compiled pursuant to Section 65962.5 and are active Comprehensive Environmental Response, Compensation, and Liability Act sites managed under a Federal Facilities Site Remediation Agreement between the Department of the Navy and DTSC. The project serves to provide protections for Site 30 and remediate Site 31.

Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
Impair implementation of, or physically interfere with,

e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis: No impairment of adopted emergency response plans or emergency evacuation plans is anticipated for work proposed at Site 30 because activates are limited to periodic inspection. All Site 31 work will be conducted in accordance with the site-specific health and safety plan, which will include an emergency response plan.

Сс	nclusion:		
	Potentially	Significant Impact	
	Potentially	Significant Unless	Mitigated
\boxtimes	Less Than	Significant Impact	
	No Impact	-	

References Used:

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 3. Department of Toxic Substances Control (DTSC) 2008. "Cortese List." Online address: http://www.dtsc.ca.gov/SiteCleanup/Cortese List.cfm.

8. Hydrology and Water Quality

Project Activities Likely to Create an Impact:

Potential damage to the Site 30 concrete cap covering.

For Site 31, the following activities would create temporary impacts:

- Placement of berm or other protective measures at storm drain within the excavation areas and stockpile areas.
- Excavation of contaminated soils by using appropriate construction equipment (may include excavator, backhoe, and front-end loader), and loading excavated soil and debris onto dump trucks.

Description of Baseline Environmental Conditions:

Treasure Island is a relatively flat, manmade island, which consists primarily of sand dredged from San Francisco Bay and retained by perimeter rock and sand dikes. Asphalt and concrete provide surface cover and are underlain by dredged fill and shoal deposits predominantly consisting of fine- to medium-grained sands, with varying proportions of shell fragments, silt, and clay. The dredged fill was emplaced on top of the shoal sands. Younger Bay Mud consisting of interbedded sand, silt, and clay underlie the shoal sands.

Groundwater is encountered at approximately 5 to 7 feet below ground surface (bgs). Based on general TI hydrogeology and basewide groundwater monitoring data, groundwater flows in an approximately northwest direction toward the shoreline. Currently, groundwater at Sites 30 and 31 is not used as a source for drinking water, agricultural, process, or industrial supply; however, it retains its designation for potential agricultural, process, and industrial supply (California Regional Water Quality Control Board, San Francisco Bay Region [Water Board] 2001).

The project site is not located within a 100-year flood hazard area. Since the project site is located in an island within San Francisco Bay, the site is subject to sieche or tsumani.

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements.

b.

C.

flooding on or off-site.

Impact Analysis: In a letter from the Water Board to the Navy, the Water Board provided its concurrence that groundwater at NAVSTA TI meets the exemption criteria in State Water Resources Control Board Sources of Drinking Water Resolution 88-63 but retains its designation for potential agricultural, process and industrial supply (Water Board 2001). Groundwater use restrictions are not retained for further evaluation at Site 30 because there are no groundwater impacts from the site. The concrete structures present at Site 30 were determined to be an effective remedy to prevent exposure to and migration of contaminants underlying Site 30. Periodic inspections of the Site 30 concrete and making any needed repairs are expected to prevent any potential exposure to contaminants.

For Site 31, no stormwater discharge to stream, rivers, or San Francisco Bay is planned. Storm drains within the excavation areas and stockpile areas will be bermed or otherwise protected, as necessary, to prevent stormwater runoff from reaching the San Francisco Bay in accordance with the stormwater management plan. Any discharges will be to the Treasure Island Sewage Treatment Plant, which is a permitted facility. Best Management Practices (BMPs) will be applied to this action. The BMPs provide measures and controls necessary to mitigate potential pollutant sources. Therefore, no water quality standards or waste discharge requirements will be violated.

Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
Impact Analysis: Groundwater at Sites 30 and 31 is not used as a source of water supply and the proposed activities do not include groundwater extraction, treatment, or removal of any kind. Consequently, the proposed project activities are not expected to substantially interfere with groundwater supplies or recharge for the area.
Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.
Impact Analysis:
No activities are included for the Site 30 remedy that would affect drainage patterns.
Following Site 31 excavation activities, site restoration will be completed, and the site returned to grade or near grade. Therefore, the existing drainage pattern in the area (surface runoff to the stormwater system) will not be altered in a manner that would result in substantial erosion. During project implementation, storm drains within the excavation areas and stockpile areas will be bermed or otherwise protected, as necessary, to prevent stormwater runoff from reaching the San Francisco Bay in accordance with the stormwater management plan. In addition, no stream or river exists in the vicinity of Sites 30 and 31.
Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

Impact Analysis: The existing drainage pattern in the area will not be altered in a manner that would result in flooding on or off site. During project implementation, storm drains within the excavation areas and stockpile areas will be

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in

	bermed or otherwise protected, as necessary, to prevent stormwater runoff from reaching the San Francisco Bay in accordance with the stormwater management plan.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
e.	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
	Impact Analysis: Restoration of the site will return the area to its original drainage patterns. Therefore the excavation areas will not contribute runoff water which would exceed capacity of the existing storm water drainage system. During the 4-month project implementation period, the storm drains at all stockpile areas must be bermed or otherwise protected, as necessary, to prevent stormwater runoff from reaching the San Francisco Bay in accordance with the stormwater management plan. Compliance of the stormwater management plan and the Remedial Design would qualify a "no impact" conclusion for project activities during the 4-month project implementation period.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
f.	Otherwise substantially degrade water quality.
	Impact Analysis: Refer to the responses to items a. through e. The Site 30 concrete pads provide an effective barrier against exposure and release of contaminants.
	For Site 31, the project will not substantially degrade water quality due to implementation of BMPs as well as compliance with the stormwater management plan and the Remedial Design.
	Conclusion: ☐ Potentially Significant Impact ☐ Potentially Significant Unless Mitigated ☐ Less Than Significant Impact ☐ No Impact
g.	Place within a 100-flood hazard area structures which would impede or redirect flood flows.
	Impact Analysis: Under the project for Site 30, no new structures will be built.
	For Site 31, no structures will be built in conjunction with this project. The creation of stockpiles at various locations may impede or redirect flood flows. However, the project site is not located within a 100-year flood hazard area.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
h.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
	Impact Analysis: Under the Site 30 and 31 projects, no structures will be built, exposed, or altered.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

i. Inundation by sieche, tsunami or mudflow.

Impact Analysis: Under the Site 30 and 31 projects, there will be no changes in topography that would result in any increased risk related to inundation by sieche or tsumani because Site 31 will be restored to original or near original grade, and Site 30 will remain unchanged.

Conclusion:
☐ Potentially Significant Impact
Potentially Significant Unless Mitigated
Less Than Significant Impact
☐ No Impact

References Used:

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island. San Francisco. California. November 16.
- 2. SulTech 2006. Final Remedial Investigation Report, Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, July.
- 3. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 4. California Regional Water Quality Control Board, San Francisco Bay Region (Water Board). 2001. "Concurrence that Groundwater at Naval Station Treasure Island, San Francisco, Meets the Exemption Criteria in the State Water Resources Control Board Sources of Drinking Water Resolution 88-63." Letter from Curtis Scott, Division Chief, Groundwater Protection and Waste Containment Division, San Francisco Bay Region. To Ann Klimek, Environmental Business Line Team Leader, Naval Facilities Engineering Command, Southwest Division. January 23.

9. Land Use and Planning

Project Activities Likely to Create an Impact:

Deed restrictions restricting commercial/industrial and residential reuse of Site 30.

There are no activities that would create an impact for the Site 31 remedy.

Description of Baseline Environmental Conditions:

According to information from the SulTech (2007) Final Feasibility Study Report for Installation Restoration Site 31, reuse plan for the area that includes IR Site 31 is designated as "Residential/Open Space/Publicly Oriented Uses." However, the reuse plan identifies the elementary school for "Institutional Use." The southeast quadrant of IR Site 31 is slated for recreational development. Treasure Island is currently federal property, and there is no zoning designation. The current land use at Sites 30 and 31 are as a daycare center and a closed elementary school yard, respectively. There is no applicable habitat conservation plan or natural community conservation plan and agency with jurisdiction over the project.

Analysis as to whether or not project activities would:

a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis: A daycare center is currently located on Site 30, and Site 31 is currently a closed school yard. The project will not affect these land uses.

Under the Site 30 project, Institutional Controls (ICs) would protect site occupants from exposure to contaminated soils by prohibiting site occupants from removing or penetrating surfaces that act as exposure prevention barriers, except when specific guidelines are followed to prevent exposure from underlying contaminated soils. Since the elementary school and 11th Street may be used under the current site use plan, provisions would be made to allow for utility repair, such as water or sewer lines, as may be required with the general maintenance of the school and 11th Street. These measures will require that all subsurface work within the contaminated zone use detailed

procedures designed to prevent exposure of the occupants and workers from exposure to COCs in soil. The following ICs and measures would be required to implement ICs for Site 30:

- DTSC would enter into a land use covenant that requires maintenance of the existing exposure prevention barriers with provision for utility repairs, as necessary.
- A deed notice would be recorded to notify the public about the existence of the contamination.
- Environmental Controls (ECs) and Institutional Controls (ICs) would be implemented that would require the monitoring, maintenance, and annual reporting on the effectiveness of existing hardscape as an exposure prevention barrier.
- A remedial action work plan (RAWP) would be developed to specify the roles and responsibilities for implementing, monitoring, and enforcing the ICs (DoD 2004).
- Five-year reviews and reporting would be conducted to ensure the continued effectiveness of the ECs and ICs.
- Deed restrictions restricting commercial/industrial and residential reuse of Site 30.

Site 31 will be cleaned to residential standards and will therefore allow for unrestricted property use.

Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact			
Conflict with any applicable habitat conservation plan or natural community conservation plan.			
Impact Analysis: There are no habitat conservation plans or natural community conservation plans.			
Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact			

References Used:

b.

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.

10. Mineral Resources

Project Activities Likely to Create an Impact:

None. The project does not have any activity that would create an impact on mineral resources. Consequently, no further analysis of Mineral Resources is deemed necessary.

Description of Baseline Environmental Conditions:

The site is composed of dredged materials. There are no mineral resources known to exist within Sites 30 and 31 project boundaries. The Site 30 and 31 areas are not locally-important mineral resource recovery sites delineated on a local general plan, specific plan or other land use plan.

Analysis as to whether or not project activities would:

 Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Impact Analysis: None. No mineral resources exist.

Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.
Impact Analysis: None. No mineral resources exist.
Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

References Used:

b

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.

11. Noise

Project Activities Likely to Create an Impact:

• There are no Site 30 project activities that would create an impact on noise. The Site 30 remedy includes Institutional Controls only. Consequently, no further analysis is deemed necessary.

For Site 31, the following activities would create temporary impacts:

- Excavation of contaminated soils by using appropriate construction equipment (may include excavator, backhoe, and front-end loader), and loading excavated soil and debris onto dump trucks.
- Transportation of contaminated soil and debris to appropriate off-site permitted treatment, storage, and disposal facilities.
- Transportation of clean-fill material from off-site locations onto Treasure Island.
- Transportation of backfill material from its staging areas on the island to the excavation areas and placement therein.

Description of Baseline Environmental Conditions:

In response to the requirements of the federal Noise Control Act, the Environmental Protection Agency (1974) has identified indoor and outdoor noise limits to protect public health and welfare (hearing damage, sleep disturbance and communication disruption). Outdoor values of 55 dBA and indoor values of 45 dBA are identified as desirable to protect against speech interference and sleep disturbance for residential, educational, and health care areas.

The California Department of Health Services (1987) has published guidelines for the noise element of local general plans. The noise element guideline identifies the normally acceptable community noise equivalent level (CNEL) range for low density residential uses as less than 60 dB, while the conditionally acceptable is 50-70 dBA. The normally acceptable range for high-density residential uses is identified as CNEL values below 65 dBA, while the conditionally acceptable range is identified as 60-70 dBA.

Typically, noise regulations correspond with zoning ordinances for a locality. This can include not only residential areas but also office, light industrial and heavy use/manufacturing activities. Regardless of classification, noise limits are regulated at the lot-line of the property.

The existing primary noise sources at the project site are typical noises from a residential neighborhood, engine noises from commercial shipping, vessel traffic, and occasional aircraft over-flights. Wind and wildlife produce ambient noise. Background decibel levels are approximately 70 dBA.

Analysis as to whether or not project activities would:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis: Heavy equipment usage during excavation and site restoration would potentially expose nearby residents or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Typical noise levels from the construction equipment that will be used will range from 69 dBA to 106 dBA at 50 feet from the source; however, the majority of typical construction activities will fall within the 75 dBA to 85 dBA range at 50 feet. Construction noise at locations farther away than 50 feet will decrease by 6 dBA to 8 dBA for each doubling of the distance from the source. The temporary increase of approximately 5 dBA to 15 dBA at a distance of at least 50 feet during the four-month project duration is not anticipated to be substantial.

	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
b.	Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.
	Impact Analysis: Heavy equipment usage during excavation and site restoration would potentially expose nearby residents or excessive groundbourne vibration or groundbourne noise levels. Refer also to the response to items a. and c.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
C.	A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.
	Impact Analysis: There is no substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project because proposed project activities will be completed within 4 months. Background decibel levels are approximately 70 dBA.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
	Impact Analysis: Since the proposed project's field activities will be completed in 4 months, there is a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. However, the temporary increase of approximately 5 dBA to 15 dBA at a distance of at least 50 feet during the four-month project duration is not anticipated to be substantial.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

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References Used:

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. City of San Francisco Planning Department 2006. Final Environmental Impact Report for the Transfer and Reuse of Naval Station Treasure Island, San Francisco, California, June.
- 3. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 4. Charles L. Perry, NAVFAC SW, BRAC, electronic communication April 28, 2008.

12. Population and Housing

Project Activities Likely to Create an Impact:

None. The project does not have any activity that would create an impact on population and housing. Consequently, no further analysis of Population and Housing is deemed necessary.

Description of Baseline Environmental Conditions:

All the Treasure Island housing is still owned by the Department of the Navy. There is no aspect of the project that would induce substantial population growth in area, either directly or indirectly.

There is no aspect of the project that would displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. Consequently, no further analysis of Population and Housing is deemed necessary.

Ana	nalysis as to whether or not project activities would:			
a. Induce substantial population growth in area, either directly (for example, by proposing new homes and busines or indirectly (for example, through extension of roads or other infrastructure).				
	Impact Analysis: None. There are no project activities for Sites 30 or 31 that would affect population growth in the area.			
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact			
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.			
	Impact Analysis: None. There will be no displacement of housing under the project.			
	Conclusion:			

Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Impact Analysis: None. There will be no displacement of residents under the project.

Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact

☐ Potentially Significant Impact

Less Than Significant Impact

Potentially Significant Unless Mitigated

References Used:

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.

13. Public Services

Project Activities Likely to Create an Impact:

• There are no Site 30 project activities that would create an impact on public services. The Site 30 remedy includes Institutional Controls only. Consequently, no further analysis is deemed necessary.

For Site 31, the following activities would create temporary impacts:

- Closure of 11th Street between Avenue D and Avenue E to prevent pedestrian trespass.
- Designation of contaminated soil stockpiles, debris stockpiles, and truck loading locations within Site 31.
- Designation of truck staging area northeast of the intersection of 11th Street and Avenue M (Figure 4).
- Designation of clean-fill staging areas to the southwest of Site 31 and southwest of the intersection of 13th Street and Avenue M (Figure 4).
- Transportation of contaminated soil and debris to appropriate off-site permitted treatment, storage, and disposal facilities.
- Transportation of clean-fill material from off-site locations onto Treasure Island.
- Transportation of backfill material from its staging areas on the island to the excavation areas and placement therein.

Description of Baseline Environmental Conditions:

The fire and police protection are provided by the City of San Francisco. The San Francisco Police Department and the Navy will ensure site security during project implementation. There is a wastewater treatment plant at Treasure Island for wastewater treatment.

Analysis as to whether or not project activities would:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

Impact Analysis: Fire and police protection are provided the City of San Francisco. The nearest fire department is across the street immediately to the west of Site 31. The nearest police department is approximately 900 yards south of the proposed project area. The nearest school, Treasure Island Elementary School, located just north of the Site 31 and is currently closed. A daycare center is located within Site 30. While a portion of 11th Street will be closed and demolished during the project, readily available alternative traffic routes exist for general public as well as emergency use.

Excavations will be advanced to a maximum depth of six feet below ground surface within the debris areas within Site 31. The depth of excavation may require a moderate amount of mechanical support or removal and replacement of underground utilities. Hand digging may be required to remove solid waste contaminated soil in close proximity to the utilities. Utilities encountered will either be temporarily rerouted to allow excavation to continue or temporarily supported during excavation activities.

	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact			
Re	eferences Used:			
	1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.			
	2. City of San Francisco Planning Department 2006. Final Environmental Impact Report for the Transfer and Reuse of Naval Station Treasure Island, San Francisco, California, June.			
	SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval ation Treasure Island, San Francisco, California, February.			
1	4. Recreation			
Pro	oject Activities Likely to Create an Impact:			
	No parks or recreational facilities are being affected by this project.			
De	escription of Baseline Environmental Conditions:			
	There are no existing regional parks or other recreational facilities located at or in the proximity of Sites 30 or 31.			
An	alysis as to whether or not project activities would:			
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.			
	Impact Analysis: None. No regional parks or recreational facilities are being affected by this project.			
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact			
b.	Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.			
	Impact Analysis: None. No recreational facilities are being affected by this project.			
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact			

References Used:

- 1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.

15. Transportation and Traffic

Project Activities Likely to Create an Impact:

• There are no Site 30 project activities that would create an impact on transportation. The Site 30 remedy includes Institutional Controls only. Consequently, no further analysis is deemed necessary.

For Site 31, the following activities would create temporary impacts:

- Closure of 11th Street between Avenue D and Avenue E to prevent pedestrian trespass.
- Closure of selected parking areas to make room for construction activities.
- Designation of contaminated soil stockpiles, debris stockpiles, and truck loading locations within Site 31.
- Designation of truck staging area northeast of the intersection of 11th Street and Avenue M (Figure 4).
- Designation of clean-fill staging areas to the southwest of Site 31 and southwest of the intersection of 13th Street and Avenue M (Figure 4).
- Transportation of contaminated soil and debris to appropriate off-site permitted treatment, storage, and disposal facilities.
- Transportation of clean-fill material from off-site locations onto Treasure Island.
- Transportation of backfill material from its staging areas on the island to the excavation areas and placement therein.

Description of Baseline Environmental Conditions:

One local residential street, 11th Street, will be closed between D and E Streets for approximately 4 months, including the intersection of 11th and E Streets. Traffic in the proposed project area is generally light. The street system at the sites consists of one lane of traffic in each direction. The street system has the capacity to handle existing and project traffic. Large 18-wheel dump trucks will travel on the perimeter road and will not use residential streets. The proposed truck transportation route within Treasure Island is presented in Figure 4. Traffic is light, posted speeds are low and there is good visibility on roads and intersections. Flagman and traffic detour signage will be used where needed. With the exception of 11th Street between D and E Streets and the intersection of 11th and D Streets, roads will remain open for emergency access. Adequate parking is already available at the project area for contractors and equipment. There is already an existing public bus system which is well utilized and keeps vehicular traffic light.

Analysis as to whether or not project activities would:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

Impact Analysis: A significant increase in traffic will not be created by this project, which will be approximately 4 months in duration. Traffic controls during excavation, transportation of soil on and off Treasure Island, backfilling and grading activities will be used to provide for the efficient completion of the work activities in a safe working environment.

Up to 7,010 cubic yards of contaminated soil and debris will be removed during remediation of Debris Areas A through E on Site 31, which correspond to approximately 390 truckloads (18-cubic-yard capacity trucks), will be transported off-site during the 4-month (i.e., 80 days) excavation phase in spring 2009. This represents 390 truck round trips during the 4-month excavation phase, or approximately five truck round trips per day. With five trucks of contaminated soils leaving the Island per day and an equal number of trucks delivering clean soils daily to the Island, there are 20 truck trips per day during the 4-month excavation and backfilling for Site 31. In an eight-hour day, one truck will be coming on the Island every 48 minutes and one truck will be leaving the Island every 48 minutes.

DTSC will require the Navy to comply with a transportation plan, which is an integral part of the Remedial Design. Therefore, project activities may not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system.

Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigate Less Than Significant Impact	d
No Impact	

b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

	jurisdiction of a county congestion management agency.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
C.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
	Impact Analysis: No materials or equipment will be stored where it will interfere with the free and safe passage of tenants and residents. If the construction operations create potential hazardous conditions to traffic, residents or tenants, then fences, signs and other devices will be used to prevent accidents or injury. All equipment will be used for its intended purpose and will not be used for incompatible purposes.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
d.	Result in inadequate emergency access.
	Impact Analysis: While working within the site boundaries, care will be taken to ensure emergency access from the area.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
e.	Result in inadequate parking capacity.
	Impact Analysis: A vacant lot is located immediately east of the Site 31 project area. There should be adequate open space for all necessary equipment, trucks, and worker's personal vehicles. Therefore, parking capacity is not expected to be impacted.
	Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact
f.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).
	Impact Analysis: No policies, plans or programs supporting alternative transportation currently exist at this closed Department of the Navy facility. Bus routes will not be impacted.
	Conclusion: ☐ Potentially Significant Impact ☐ Potentially Significant Unless Mitigated ☐ Less Than Significant Impact ☐ No Impact
Re	ferences Used:

Impact Analysis: The project site is not subject to a level of service standard since it does not fall under the

f.

References Used:
1. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.

- 2. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 3. San Francisco MUNI bus line website: http://www.sfmta.com/cms/mmaps/documents/108.pdf.

16. Utilities and Service Systems

Project Activities Likely to Create an Impact:

 Transportation of contaminated soil and debris to appropriate off-site permitted treatment, storage, and disposal facilities.

Description of Baseline Environmental Conditions:

There is no aspect of the project that would require wastewater treatment approvals from the San Francisco Bay Regional Water Quality Control Board. There will be no wastewater treatment onsite. Any collected wastewater will either be discharged to the permitted Treasure Island Wastewater Treatment Plant or removed from Site 31.

The project activities will not require the construction of new water or wastewater treatment facilities or expansion of existing facilities. This project will not require the construction of new or expansion of storm water drainage. The project will not change the existing site drainage. No new or expanded water supply entitlements are needed for this project.

The Navy Wastewater Treatment Plant on Treasure Island, currently operated by cooperative agreement by the San Francisco Public Utilities Commission, will serve this project as needed.

Waste associated with project activities will be disposed of in a licensed off-site facility with sufficient permitted capacity to accept the sold waste generated from project activities.

Analysis as to whether or not project activities would:

Impact Analysis:	None.	Wastewater proposed for discharge will be tested prior to discharge to a permitted treatment
facility.		

Tability.	
Conclusion: Potentially Significant Impact Potentially Significant Unless Mitigated Less Than Significant Impact No Impact	

Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis: None required.

Conclusion:

Potentially Significant Impact

Potentially Significant Unless Mitigated

Less Than Significant Impact

No Impact

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis: None required.

Conclusion:

☐ Potentially Significant Impact

Potentially Significant Unless Mitigated

habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to

The project \(\subseteq \text{has} \subseteq \text{does not have the potential to degrade the quality of the environment, substantially reduce the

	animal, or eliminate important exam	ples of the major periods of California history or preh	istory.		
b.	"Cumulatively considerable" means	re impacts that are individually limited but cumulatively that the incremental effects of an individual project as projects, the effects of other current projects, and the	re considerable when viewed		
C.	The project ☐ has ☒ does not have beings, either directly or indirectly.	e environmental effects that will cause substantial ad	verse effects on human		
<u>De</u>	termination of Appropriate Enviro	nmental Document:			
Bas	ed on evidence provided in this Initi	al Study, DTSC makes the following determination:			
	The proposed project COULD NOT pared.	HAVE a significant effect on the environment. A Neg	ative Declaration will be		
effe		E a significant effect on the environment. However, the project have been made by or agreed to by the pr			
	The proposed project MAY HAVE a uired.	significant effect on the environment. An Environme	ntal Impact Report is		
on leg atta	the environment, but at least one eff al standards, and 2) has been addre	"potentially significant impact" or "potentially significant ect 1) has been adequately analyzed in an earlier doo ssed by mitigation measures based on the earlier and npact Report is required, but it must analyze only the	cument pursuant to applicable alysis as described on		
(a) app Ne	☐ The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.				
Се	rtification:				
req		ished above and in the attached exhibits, present the to the best of my ability and that the facts, statements nowledge and belief.			
	Rivar Meya		9/9/08		
	Preparer's	s Signature	Date		
	Ryan Miya Preparer's Name	Senior Hazardous Substances Scientist Preparer's Title	(510) 540-3775 Phone #		
	12/19/1		919108		
	Branch or Uni	t Chief Signature	Date		
	Daniel E. Murphy Program or Unit Chief Name	Supervising Hazardous Substances Engineer Program or Unit Chief Title	(510) 540-3772 Phone #		
		-			

eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or

ATTACHEMENT A

REFERENCES

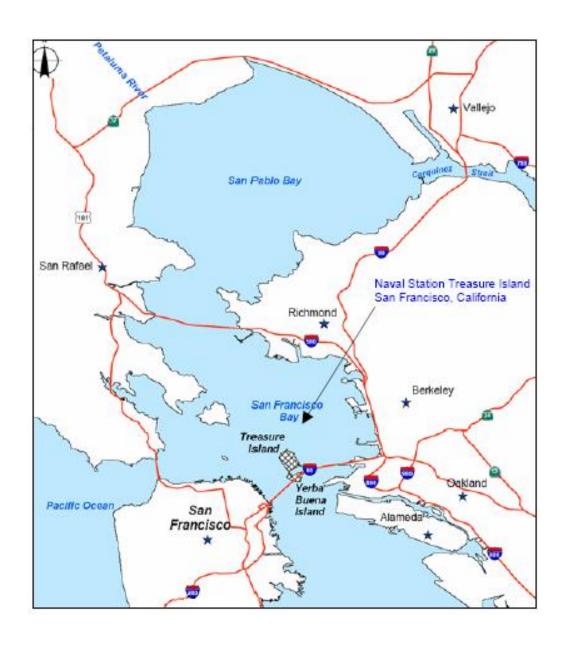
Remedial Action Plans for Naval Station Treasure Island Installation Restoration Sites 30 (Daycare Center) and 31 (Former South Storage Yard)

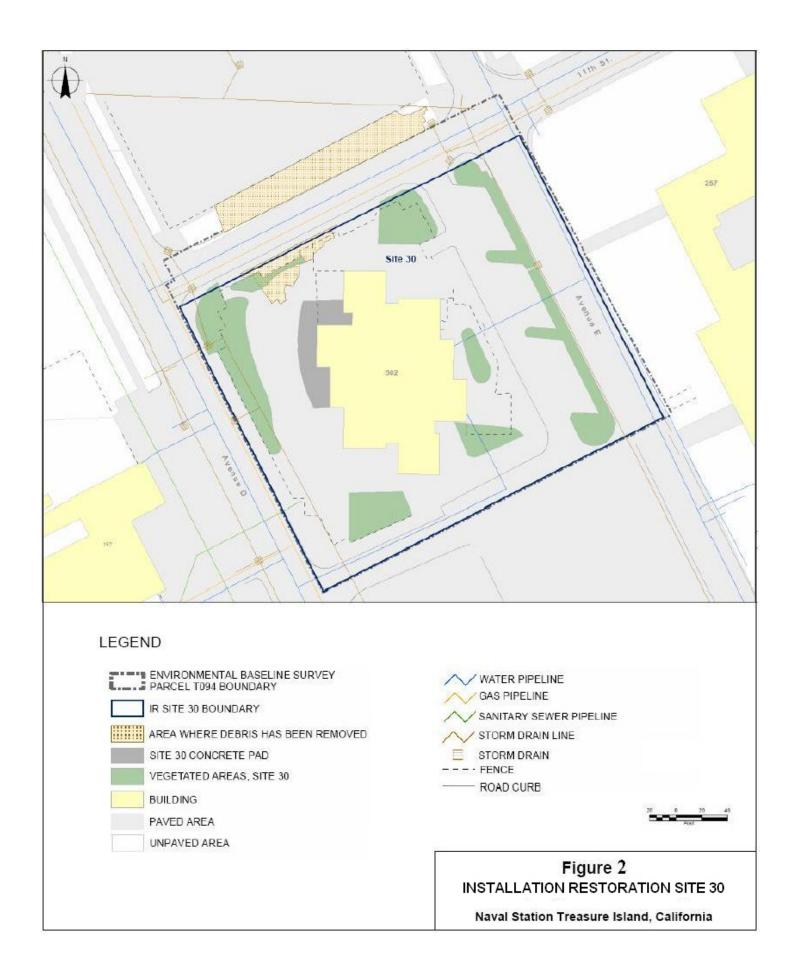
- 1. Bay Area Air Quality Management District 1999. BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans, Prepared by the Planning and Research Division of the BAAQMD. San Francisco, California, December.
- 2. California Department of Fish and Game Natural Diversity Database report for the Oakland West quadrant, March 30, 2008.
- 3. California Regional Water Quality Control Board, San Francisco Bay Region (Water Board). 2001. "Concurrence that Groundwater at Naval Station Treasure Island, San Francisco, Meets the Exemption Criteria in the State Water Resources Control Board Sources of Drinking Water Resolution 88-63." Letter from Curtis Scott, Division Chief, Groundwater Protection and Waste Containment Division, San Francisco Bay Region. To Ann Klimek, Environmental Business Line Team Leader, Naval Facilities Engineering Command, Southwest Division. January 23.
- 4. CARB map entitled, "General Location Guide for Ultramafic Rocks in California-Areas Most Likely to Contain Naturally Occurring Asbestos". SulTech, 2006. Final Remedial Investigation Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, February.
- 5. Charles L. Perry, NAVFAC SW, BRAC, electronic communication April 28, 2008.
- 6. City of San Francisco Planning Department 2006. Final Environmental Impact Report for the Transfer and Reuse of Naval Station Treasure Island, San Francisco, California, June.
- 7. City of San Francisco Planning Department 2006. Final Environmental Impact Report for the Transfer and Reuse of Naval Station Treasure Island, San Francisco, California, June.
- 8. Department of Toxic Substances Control (DTSC) 2008. "Cortese List." Online address: http://www.dtsc.ca.gov/SiteCleanup/Cortese List.cfm.
- 9. San Francisco MUNI bus line 2008. Online address: http://www.sfmta.com/cms/mmaps/documents/108.pdf.
- 10. SulTech 2007. Final Feasibility Study Report for Installation Restoration Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California, February.
- 11. SulTech, 2006 Final Feasibility Study Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, November 16.
- 12. SulTech, 2006. Final Remedial Investigation Report, Installation Restoration Site 30, Daycare Center, Naval Station Treasure Island, San Francisco, California, February.

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- FIGURE 2 Installation Restoration Site 30 Map
- FIGURE 3 Installation Restoration Site 31 Map
- FIGURE 4 Proposed Truck Transportation Route, Truck Staging, and Clean Soil Staging Areas within Treasure Island

FIGURE 1 – Naval Station Treasure Island Vicinity Map.





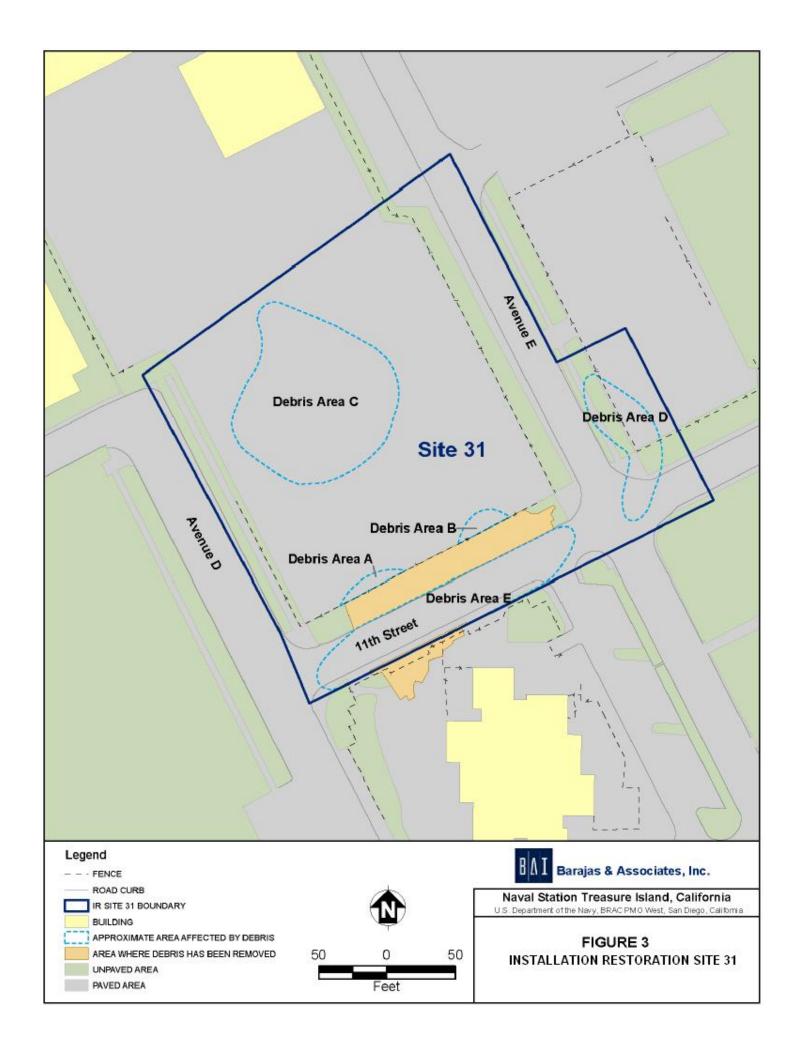


FIGURE 4 - Proposed Truck Transportation Route, Truck Staging, and Clean Soil Staging Areas within Treasure Island.

